

\*\*E-filed 1/22/07\*\*

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11 IN THE UNITED STATES DISTRICT COURT  
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
13 SAN JOSE DIVISION

14 TAMRA CURTIS, ) Case No. C-06-06684 JF PVT  
15 Plaintiff, )  
16 vs. ) STIPULATION AND [PROPOSED  
17 BERLINER COHEN LAW FIRM, JOSEPH ) ORDER] CONTINUING CASE  
18 K. FASULO, ) MANAGEMENT CONFERENCE  
19 Defendants. )  
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21 STIPPULATION

22 Counsel for the parties stipulate as follows:

- 23 1. Plaintiff's complaint was served on defendants on December 4, 2006. On December  
24 22, 2006, defendants moved the Court for an order dismissing plaintiff's complaint in its  
25 entirety. Said motion is scheduled for hearing on February 16, 2007.
2. The Case Management Conference is currently scheduled for January 26, 2007. ADR  
certificates and initial disclosures are due prior thereto.
3. The parties desire to have a ruling on the defendants' motion to dismiss prior to  
making initial disclosures, and prior to the Case Management Conference, and for that reason

1 move the Court for an order continuing the Case Management Conference to April 13, 2007.  
2 April 13, 2007 is requested because defense counsel is scheduled to be out of the country from  
3 March 12<sup>th</sup> through April 3<sup>rd</sup>.

4 4. Counsel shall meet and confer, and comply with Local Rule 16-8, no later than March  
5 23, 2007. Initial disclosures shall be made no later than April 6, 2007.

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7 Dated: January 8, 2007

/s/ Norman Newhouse  
Counsel for Plaintiff

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10 Dated: January 9, 2007

/s/ Steven R. Manchester  
Counsel for Defendants

11  
12 ORDER

13 PURSUANT TO STIPULATION, IT IS SO ORDERED.

14 Date: 1/19/07

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Jeremy Fogel  
District Court Judge